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Settlement Date: December 22, 2020, 12:00 p.m.
Objection Deadline: December 21, 2020 at 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L.
Madoff Investment Securities LLC and Bernard L.
Madoff,

Plaintiff,

v.

KUNTZMAN FAMILY LLC; JACQUELINE D.
GREEN, in her capacity as a Managing Member of
the Kuntzman Family L.L.C. and as Trustee of the

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

Adv. Pro. No. 10-04752 (SMB)

Irrevocable Trust FBO Jennifer Gattegno and the Irrevocable Trust FBO Ethan Siegel, both members of the Kuntzman Family L.L.C, WAYNE D. GREEN, in his capacity as a Managing Member of the Kuntzman Family L.L.C.; JUDITH GATTEGNO, in her capacity as a Member of the Kuntzman Family L.L.C.; IRREVOCABLE TRUST FBO JENNIFER GATTEGNO, in its capacity as a Member of the Kuntzman Family LLC; AND IRREVOCABLE TRUST FBO ETHAN SIEGEL, in its capacity as a Member of the Kuntzman Family L.L.C.,

Defendant.

**NOTICE OF SETTLEMENT OF ORDER GRANTING CHAITMAN LLP'S
APPLICATION TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that pursuant to Judge Bernstein's bench ruling at the December 16, 2020, hearing on Chaitman LLP's Application to Withdraw as Counsel, and in accordance with Local Bankruptcy Rule 9074-1(a), the undersigned will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for settlement and signature in his chambers located at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **December 22, 2020 at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE that the Trustee has consulted with counsel for defendant Kuntzman Family LLC ("Defendant"), but the Trustee has not received consent from Defendant for the filing of the attached proposed order.

PLEASE TAKE FURTHER NOTICE that to the extent there is a counter-proposed order or objection to the proposed order, it must be in writing and filed with the Clerk of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 by no later than **December 21, 2020 at 5:00 p.m.** (the "Objection Deadline"),

with a courtesy copy delivered to the chambers of the Honorable Stuart M. Bernstein; and served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan, Esq., and (b) Securities Investor Protection Corporation, 1667 K St. N.W., Suite 1000, Washington, D.C. 20006-1620, Attn: Kevin H. Bell, Esq. Any objection to the proposed order must specifically state the interest the objecting party has in these proceedings and the specific basis of any objection. Unless a counter-proposed order or written objection to the proposed order is received before the objection deadline, the proposed order may be signed and entered by the Court without further notice.

Dated: December 17, 2020
New York, New York

Of Counsel:

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the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the Chapter
7 Estate of Bernard L. Madoff*